IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

: Case No.: 18-17430

Sharonn E. Thomas : Chapter 7

Judge Eric L. Frank

Debtor(s):

Wilmington Trust, National Association, : Date and Time of Hearing not in its individual capacity, but solely : Place of Hearing

as trustee for MFRA Trust 2015-1 : March 13, 2019 at 10:00 a.m.

Movant,

: U.S. Bankruptcy Court VS

900 Market Street, Courtroom #1

: Philadelphia, PA, 19107 **Sharonn E. Thomas**

Terry P. Dershaw

Respondents.

NOTICE OF MOTION, RESPONSE DEADLINE, AND HEARING DATE

Wilmington Trust, National Association, not in its individual capacity, but solely as trustee for MFRA Trust 2015-1 has filed a Motion for Relief from Automatic Stay and Abandonment.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney you may wish to consult an attorney.)

- 1. If you do not want the Court to grant the relief sought in the motion or if you want the Court to consider your views on the motion, then on or before February 27, 2019, you or your attorney must do ALL of the following:
 - A. File an answer explaining your position at:

Clerk, U.S. Bankruptcy Court

U.S. Bankruptcy Court 900 Market Street Philadelphia, PA, 19107

If you mail your answer to the bankruptcy clerk's office for filing, you must mail it early enough so that it will be received on or before the date stated above, and

B. Mail a copy to the Creditor's attorney and the below listed:

United States Trustee Office of the U.S. Trustee 833 Chestnut Street, Suite 500 Philadelphia, PA 19107

Terry P. Dershaw Dershaw Law Offices P.O. Box 556 Warminster, PA 18974-0632

Manley Deas Kochalski LLC P.O. Box 165028 Columbus, OH 43216-5028

- 2. If you or your attorney do not take the steps described in paragraphs 1(a) and 1(b) above, and attend the hearing, the Court may enter an Order granting the relief requested in the Motion.
- 3. A hearing on the Motion is scheduled to be held before the Honorable Eric L. Frank on March 13, 2019 at 10:00 a.m. in U.S. Bankruptcy Court, 900 Market Street, Courtroom #1, Philadelphia, PA, 19107.
- 4. If a copy of the Motion is not enclosed, a copy of the Motion will be provided to you if you request a copy from the attorney named in paragraph 1(b).
- 5. You may contact the Bankruptcy Clerk's office to find out whether the hearing has been canceled because no one filed an answer.

DATE: <u>February 12, 2019</u>

IN THE UNITED STATES BANKRUPTCY COURT FOR THE EASTERN DISTRICT OF PENNSYLVANIA

In re:

Case No.: 18-17430

Sharonn E. Thomas : Chapter 7

Judge Eric L. Frank

Debtor(s) : *************

•

Wilmington Trust, National Association, : Date and Time of Hearing

not in its individual capacity, but solely : Place of Hearing

as trustee for MFRA Trust 2015-1 : March 13, 2019 at 10:00 a.m.

Movant, :

: U.S. Bankruptcy Court

: 900 Market Street, Courtroom #1

Sharonn E. Thomas : Philadelphia, PA, 19107

:

Terry P. Dershaw

Respondents.

CERTIFICATE OF SERVICE

The undersigned hereby certifies that a copy of the foregoing Notice of Motion, Response Deadline, and Hearing Date regarding Motion for Relief from Automatic Stay and Abandonment was served on the parties listed below via e-mail notification:

United States Trustee, Office of the U.S. Trustee, 833 Chestnut Street, Suite 500, Philadelphia, PA 19107

Terry P. Dershaw, Chapter 7 Trustee, Dershaw Law Offices, P.O. Box 556, Warminster, PA 18974-0632

Joshua Louis Thomas, Attorney for Sharonn E. Thomas, P.O. Box 415, P.O. Box 415, Pocopson, PA 19366, joshualthomas@gmail.com

The below listed parties were served via regular U.S. Mail, postage prepaid, on February 12, 2019:

Sharonn E. Thomas, 856 North 29th St., Philadelphia, PA 19130

Sharonn E. Thomas, 2045 W Oxford St, Philadelphia, PA 19121-4001

City of Philadelphia, 1401 JFK Blvd, Concourse Level, Department of Revenue - Water Revenue, Philadelphia, PA 19102

DATE: <u>February 12, 2019</u>

/s/ Karina Velter

Karina Velter, Esquire (94781)
Adam B. Hall (323867)
Sarah E. Barngrover (323972)
Manley Deas Kochalski LLC
P.O. Box 165028
Columbus, OH 43216-5028
Telephone: 614-220-5611
Fax: 614-627-8181
Attorneys for Creditor
The case attorney for this file is Karina
Velter.
Contact email is kvelter@manleydeas.com